

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

|   |   |                                    |
|---|---|------------------------------------|
| <b>CYNDAL TODD</b><br><b>Plaintiff,</b>                                   | ) |                                    |
|   | ) |                                    |
| vs.   | ) | Civil Action No. 1:12-cv-12072-RBC |
| <b>TOTAL RECOVERY SOLUTION, LLC</b><br><b>et al.</b><br><b>Defendant,</b> | ) |                                    |
|   | ) |                                    |

**NOTICE OF WITHDRAWAL OF COMPLAINT AND VOLUNTARY DIMISSAL OF  
ACTION WITH PREJUDICE  
PURSUANT TO RULE 41(a)**

Cyndal Todd ("Plaintiff"), by Plaintiff's attorney, hereby withdraws the complaint and voluntarily dismisses this action, with prejudice, pursuant to FED. R. CIV. P. 41(a)(1)(A)(i).

Dated: January 23, 2013

RESPECTFULLY SUBMITTED:

/s/ Kevin V. K. Crick, Esq.  
Kevin V. K. Crick  
Consumer Rights Law Firm, PLLC  
300 Brickstone Square, Suite 902  
Andover, MA 01810  
Phone: (978) 212-3300  
Fax: (978) 409-1846  
Email: [kevinc@consumerlawfirmcenter.com](mailto:kevinc@consumerlawfirmcenter.com)  
Attorney for Plaintiff

**PROOF OF SERVICE**

I hereby certify that on January 23, 2013, a copy of the foregoing was filed electronically in accordance with the Court's Electronic Filing Guidelines. Notice of this filing will be sent to all parties by operation of the court's electronic filing system and electronic email. Parties may access this filing through the court's system.

/s/ Kevin V. K. Crick, Esq.